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CORRESPONDENCE
CONTROL



January 23, 2004

04-RF-00105

Frazer R. Lockhart
Manager
DOE, RFPO

KAISER-HILL COMPREHENSIVE CORRECTIVE ACTION PLAN ~ AMP-001-04

Ref: John T. Conway, Chairman, DNFSB, ltr, to The Honorable Spencer Abraham,
December 2, 2003

The Defense Nuclear Facilities Safety Board (the Board) requested that the Department of Energy, Rocky Flats Project Office (DOE-RFPO) provide a corrective action plan regarding how DOE and its contractor at the Rocky Flats Environmental Technology Site (RFETS) will address the findings documented in the referenced correspondence. This letter outlines the major actions being taken by Kaiser-Hill Company, LLC (Kaiser-Hill) in response to the concerns and issues raised. These actions are specifically targeted to address the problems that are associated with:

- Implementing the five core functions of Integrated Safety Management.
- Improving work planning, with particular attention paid to hazard analysis.
- Strengthening our Safety Management Program with a major focus on the combustible control program.
- Fully understanding the Building 371 Glove Box 8 fire event and failures, including mistakes made during the building evacuation.

Building 371 Glovebox 8 Fire

Mark Spears, my Vice President and Project Manager for Material Stewardship, is leading an independent investigation focused on the glove box 8 fire in Building 371. That investigation is underway with a well-qualified team of independent experts. To ensure his full attention to this investigation, I have directed him to delegate the day-to-day operations of Material Stewardship to his Deputy Project Manager.

The current schedule for that investigation includes:

- Interviews and field investigation work, completed January 20, 2004.
- Discussion of investigation and preliminary results with Board staff (Massie), completed January 21, 2004.
- Investigation Report review and approval, scheduled for February 6, 2004.

Kaiser-Hill Company, L L C

Rocky Flats Environmental Technology Site, 10808 Hwy. 93 Unit B, Golden, CO 80403-8200 • 303-966-7000

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- Completion of the Independent Fire Cause and Origin report by February 2, 2004.
- Briefings with the DNFSB and DOE Headquarters staff the week of February 16, 2004.

Sitewide Implications and Corrective Actions

The fire, your report, and our subsequent evaluations have raised larger questions about the health of the Site's ISM system implementation. Independent from the investigation of the fire, I have embarked on four additional reviews to address these broader issues:

1. A cause analysis of three events (Valve Vault 14 demolition, isolation of incorrect fire protection riser in Building 440, and Zone I duct removal in Building 707 E Module) that had been reported to the Price Anderson Office of Enforcement. This cause analysis was performed by the Safety, Engineering, and Quality Programs (SE&QP) staff with Project support. In addition to the three events cited above, I asked the team to evaluate other significant work planning and work control events that have occurred over the past year. This team reviewed over 1500 events reported through our Safety Analysis Center (SAC) and identified 103 with specific work planning and execution issues requiring in-depth analysis.

The results of the analysis indicated that 31% of the work control events over the last year were related to inadequate work package development, and 47% were related to inadequate work package compliance.

2. A review of several significant events during FY03. These include the issues identified in the DNFSB letter concerning Integrated Safety Management (ISM), the glovebox fire in B371, and the Price Anderson Investigation Summary. The team developed a list of underlying, common causes and recommended a comprehensive corrective action plan to address those causes.
3. An independent review of key safety functions including cause analysis, corrective actions, and assessments by a corporate team from CH2M Hill. This review was started January 12, 2004.
4. An independent review of our Integrated Safety Management System by a team from Washington Safety Management Solutions, LLC. This review is scheduled to begin January 26, 2004.

Based on the results from 1 and 2 above, it is clear that the following weaknesses exist:

- As the Site has progressed from nuclear operations to D&D, we have seen an erosion of compliance with work packages and procedures. Analysis of work control related events and workforce feedback indicate that some levels of supervision and some work teams do not view D&D work packages and procedures as necessary to performing work safely.
- A number of successes in production, reductions in significant nuclear hazards as the Special Nuclear Material (SNM) has left the Site, a transition to conventional industrial hazards, and improvements in OSHA statistics led to overconfidence and a tendency to downplay the significance of events, errors and leading indicators.
- The emphasis on line management ownership of safety led to a lack of balance between project authority and independent compliance and safety functions.

To address these weaknesses, a comprehensive set of corrective actions was developed and approved by the newly formed Executive Safety Review Board (ESRB). Further corrective actions will be developed as items 3 and 4 above are completed. Attached is an initial, draft corrective action plan that focuses on these underlying weaknesses to begin to strengthen three basic areas:

- Work Planning and Execution
- Cause Analysis and Corrective Actions
- Assessments

The corrective action starts with me. I have made my performance and safety expectations clear throughout line management. I have met collectively and individually with my project managers and reinforced my expectations in the areas of:

- Accountability for both safety and performance
- Critical cause analyses and effective corrective actions
- Floor presence and mentoring by Senior Management and Safety Professionals
- Open internal and external reporting

- Procedural compliance
- Self and independent assessments

To drive enduring results I have formed and personally chair the ESRB. The ESRB was established to oversee the identification, analysis, reporting, and corrective actions of safety significant events and issues with programmatic implications. The purpose of the ESRB is:

- Provide senior, seasoned crosscutting perspective
 - Ensure root causes are accurately determined
 - Ensure proposed corrective actions adequately address the causes
- Provide strong corporate support for corrective action implementation
- Provide assurance that corrective actions have achieved the desired results
 - Provide feedback and senior management direction concerning the focus and conduct of assessments

I have taken steps to promote an active and productive interaction between SE&QP and the Projects that emphasizes a self-critical, objective assessment of safety and compliance. A balanced set of critical independent assessments and self-assessments is being scheduled based on risk and potential consequences. These are aimed at providing useful and timely information to line management for identifying safety issues, preventing future events, and highlighting opportunities for improvement.

I am in the process of personally re-emphasizing to line management (Vice Presidents through job supervisors) their accountability for compliance with Kaiser-Hill and DOE requirements.

We have looked carefully and introspectively at the Board letter and at other indications of our safety performance. A detailed crosswalk was used to evaluate our proposed corrective actions to each of the specific issues in the Board letter. I believe the commitments contained in the table below will effectively address both the findings and the root causes of the issues identified in the letter.

January 23, 2004
Frazer R. Lockhart
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Action	Investigation/ Assessment	Report Completion	Corrective Actions Identified	Corrective Actions Im plemented	Effectiveness Assessment
independent Building 371 GB 8 Fire investigation	12/19/04 - 2/2/04	2/6/04	March 2004	TBD	TBD
Cause Analysis of 3 events reported under PAAA (item 1)	10/29/03 - 11/24/03	12/10/03	January 2004	May 2004	November 2004
Collective review of corrective action plans for FY03 significant events (Item 2)	12/29/03 - 1/9/04	1/9/04	1/21/04	May 2004	October 2004
Corporate independent review of key safety functions (Item 3)	1/12/04 - 1/16/04	1/30/04	February 2004	TBD	TBD
independent review of ISM System (Item 4)	1/26/04 - 2/6/04	2/13/04	March 2004	TBD	TBD

As line management is accountable for safety, I am looking forward to working with you and your staff as we work together to ensure the site is closed safely.



Alan M. Parker
President & CEO
Kaiser-Hill Company, LLC

Attachment:
As Stated

Original and 1cc – Frazer R. Lockhart

cc:
Ed Westbrook – DOE, RFPO

KAISER-HILL COMPREHENSIVE CORRECTIVE ACTION PLAN

Issue	Desired Outcome	Corrective Actions	Schedule
<p>ite performance. work force feedback and analyses of work control related events over the last year indicate that 47% of work control failures were the result of procedural non-compliance, 31% were poorly written, and that some levels of supervision and some work teams do not view D&D work packages and procedures as necessary to performing work safely.</p> <p>number of successes in reduction. reductions in significant nuclear hazards, a transition to conventional industrial hazards, and improvements in ISHA statistics led to overconfidence and a tendency to downplay the significance of events. errors and leading indicators.</p>	<p>All levels of the workforce, including subcontractors, develop work control documents that provide adequate controls and follow those documents.</p>	<p>1 CEO clarify expectations with VPs on:</p> <ul style="list-style-type: none"> Accountability and Performance <ul style="list-style-type: none"> The need for robust, self critical cause analyses; ensuring that cause analysis teams are sufficiently staffed: and effective corrective actions Value of on-the-floor presence of all levels of Management and Safety Professionals, and mentoring as an effective tool Need for open internal and external reporting <ul style="list-style-type: none"> Importance of Procedural Compliance Value and importance of both self & independent assessments <p>CEO discuss the initiating deficiencies, causes, and corrective actions of this plan, and expectations and accountability with managers down to the job supervisor level.</p> <p>VPs clarify expectations with the workforce on importance of procedural compliance.</p>	<p>Parker 1/30/04</p> <p>Parker 2/27/04</p> <p>Project VP 2/27/04</p>
	<p>The CEO is confident that the workforce understands and believes messages being sent by management.</p>	<p>2 CEO establish communication method with job supervisors to verify that messages being sent to the workforce are being accurately received.</p>	<p>Parker 2/27/04</p>
	<p>The prepared procedures and work packages are useful to the work team in getting the work done safely and efficiently.</p> <p>Work teams use work packages and procedures to complete work activities.</p>	<p>3 Provide clear guidance and expectations for effectively developing and using procedures and work packages.</p> <ul style="list-style-type: none"> 	<p>Williams 3/31/04</p> <p>Projects 4/30/04</p>

KAISER-HILL COMPREHENSIVE CORRECTIVE ACTION PLAN

ite Issue	Desired Outcome	Corrective Actions	Schedule
		c. Develop examples for Type 1, Standard, and Craft Work IWCP packages.	Williams 3/31/04
	Each Project has a process for review of work packages and procedures that validates the adequacy of work documents for use.	1 Evaluate and revise if necessary, the current process for Project review and release of work packages and procedures to ensure the process: <ul style="list-style-type: none"> Validates the type of package Ensures the scope is appropriately defined and hazards identified Ensures the level of detail for controls and instructions is appropriate 	Projects 3/31/04
	Pre-work execution communications: <ul style="list-style-type: none"> Pre-work execution Identify and resolve potential conflicts with other activities and facility functions. Identify and resolve potential conflicts with other activities and facility functions. Ensure the work crew understands the daily work scope, hazards, and controls 	5 Provide clear guidance and expectations for conducting effective Pre-Evolution Briefings and conducting effective Plan of the Day meetings. Revise Site Conduct of Operations Manual, MAN-066-COOP to: <ul style="list-style-type: none"> Enhance the Pre-evolution brief process to ensure that the work crew and supervisor fully understand the daily work scope, hazards, and controls and are ready to go to work. Enhance the Plan Of the Day (POD) process to require discussion of concurrent/sequential work activities than may interact, interfere or impact other activities at the POD. Clearly communicate changes and appropriately train the workforce to effectively implement COOP changes.	Williams 1/19/04 Complete 1/15/04
	Existing Standing Orders are still appropriate to disseminate information or instructions to Site personnel.	3 Review Standing Orders and revise, extend, supercede, delete, or incorporate as appropriate.	Projects 02/02/04 Complete 12/26/03
The emphasis on line management ownership of safety led to a lack of balance between project authority and independent compliance and safety functions.	There is an organization with the charter to ensure that safety significant events and programmatic issues are critically analyzed, reported, and corrected as appropriate.	7 Establish Executive Safety Review Board (ESRB) to oversee the identification, analysis, reporting, and corrective actions of safety significant events and issues with programmatic implications.	Complete 12/12/03

Site Issue	Desired Outcome	Corrective Actions	Schedule
	<p>There is an active and productive interaction between SE&QP and the Projects that ensures a self-critical objective assessment of safety and compliance performance.</p> <p>A balanced set of critical independent assessments and self-assessments are scheduled based on risk and potential consequences, and performed to provide useful information for identifying safety issues and opportunities for improvement. Qualified resources are available to conduct assessments. They are knowledgeable, critical, independent, and can speak with authority and credibility.</p>	<p>8 Revise CY04 Integrated Assessment schedule based on risk priorities. Augment assessment teams as necessary with internal and external resources. Include the following:</p> <p>INDEPENDENT ASSESSMENT</p> <ul style="list-style-type: none"> ISM/work control implementation Implementation of training in the Projects Self assessment process effectiveness Cause Analysis and Corrective Action Process including implementation <p>SELF-ASSESSMENTS</p> <ul style="list-style-type: none"> Work control execution Combustible control implementation COOP = accountability, formality of ops, HIS 20, housekeeping 	<p>Ford 1/31/04</p>
	<p>Site Safety Management Program (SMP) owners provide information useful to the Site in identifying needed SMP improvements and SMP weaknesses.</p>	<p>9 Meet with all Site Safety Management Program (SMP) owners to reaffirm expectations and accountability for their role as SMP owners in assessing SMP health, communicating issues, and establishing SMP Assessment Criteria.</p>	<p>Lyle 2/13/04</p>
	<p>The Safety Analysis Center (SAC) information is used by the Site in recognizing individual, multiple, and programmatic safety issues and effecting corrective action.</p>	<p>10 Enhance the Safety Analysis Center (SAC) process to:</p> <ul style="list-style-type: none"> Improve identification of programmatic & collective significance of events, potential trends, and precursor conditions Establish an active Interface with the ESRB and criteria for referring events and analyses to the ESRB Adopt ORPS Cause codes Establish and report on procedural compliance metrics Clarify process for dispositioning of DOE Facility Representative comments Collect and disseminate Independent and Self Assessment data to SMP owners Provide input to Communications on trends, emerging, or cyclic issues for use in employee communication tools. 	<p>Williams 2/20/04</p>

independence, sincerity, and depth of the GB-8 fire investigation are satisfied.		/Analysis, corrective actions.	2/6/04
meets the highest standards and provides useful, self critical information for projects to use in continuous improvement.		assessment processes and revise as necessary to include appropriate treatment of precursor conditions	3/31/04
K-H's safety and compliance status is verified by corporate assessments.	13	CH2M Hill Corporate perform periodic assessments of selected safety functions. Include evaluation of the impact that communications have had on safety culture on the floor.	Christopher 1/30/04 (Initial)
Implementation of work control, combustible control, conduct of operations, and formality of operations is measured by critical self-assessments.	14	Perform self assessments in the following areas: <ul style="list-style-type: none"> • Work control and execution • Combustible control program implementation • Use of accountability boards • Formality of operations in CCA offices • Use of HIS 20 system • Housekeeping in out of the way areas 	Projects 3/31/04

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March 24, 2004

04-RF-00354

Frazer R. Lockhart
Manager
DOE, RFPO

- Refs
- 1) John T. Conway, Chairman, DNFSB, ltr, to The Honorable Spencer Abraham, December 2, 2003
 - 2) Alan M. Parker, President & CEO, Kaiser-Hill Company, LLC, ltr AMP-001-04, to Frazer R. Lockhart, January 23, 2004
 - 3) Stephen M. Sohinki, Director, DOE Office of Price-Anderson Enforcement, ltr EA 2004 02, to Alan Parker, February 3, 2004

KAISER-HILL COMPREHENSIVE CORRECTIVE ACTION PLAN - UPDATE - AMP-008-04

Dear Frazer:

The Defense Nuclear Facilities Safety Board (the Board) requested that the Department of Energy, Rocky Flats Project Office (DOE-RFPO) provide a corrective action plan regarding how DOE and Kaiser-Hill Company, LLC (Kaiser-Hill) would address the findings documented in their referenced letter. On January 23, 2004, Kaiser-Hill provided an interim status report to the Board. That input described the major actions being taken by Kaiser-Hill in response to the concerns and issues raised by the Board. The purpose of this letter is to provide Kaiser-Hill's comprehensive response and ongoing actions to ensure that the site is closed safely.

Kaiser-Hill's comprehensive response is based on all the completion of all of the five reviews that Kaiser-Hill committed to in January. These included three independent reviews, performed by personnel from outside Kaiser-Hill, and two reviews performed by internal personnel.

- We gained substantial insight from the Independent Building 371 Glovebox 8 Fire Investigation concerning work planning, our response to events and our pursuit of corrective actions;
- An independent ISM implementation review concluded that the Kaiser-Hill ISM System is in place and implemented, implementation issues were noted in the areas of work control, fire response, and assessment of safety management programs;
- A review of our assessment programs, causal analysis and corrective action management by corporate personnel from CH2M HILL has added to our understanding of site challenges in this arena; and
- Two internal analyses of events reported under PAAA and significant events during FY03 permitted us to place our recent operating experience into perspective.

Kaiser-Hill Company, L L C

Rocky Flats Environmental Technology Site, 10808 Hwy. 93 Unit B, Golden, CO 80403-8200 ♦ 303-966-7000

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Individual findings and observations from each of these reviews have been captured and corrective actions are included in the Comprehensive Corrective Action Plan.

To ensure the systematic management of the corrective actions and their completion, I have formed the Kaiser-Hill Comprehensive Corrective Action Plan (CCAP) Task Force that includes personnel from outside to ensure an independent perspective. Working closely with the Executive Safety Review Board, this group has been tasked to:

- Ensure that the CCAP comprehensively and effectively addresses required actions;
- Coordinate validation of the effectiveness of CCAP corrective actions;
- Provide assistance to project and program owners in ensuring that corrective actions are properly addressed and closed;
- Establish a mechanism that ensures that corrective action closure documentation is captured;
- Establish and maintain evidence files for CCAP corrective actions; and
- Ensure that evidence files are properly maintained and catalogued.

I believe that we have a clear understanding of the causes behind the series of events experienced at RFETS. The CCAP addresses all of the major issues, however, it is a living document that will be updated as we complete assessments covering the effectiveness of our corrective actions. I look forward to continuing to work with you and your staff as we continue to take actions that will enhance the safety of site closure activities. I will share any revisions to the CCAP with your staff as they occur.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan M. Parker". The signature is fluid and cursive, with a long horizontal stroke at the end.

Alan M. Parker
President & CEO
Kaiser-Hill Company, LLC

Attachment:
As Stated

Original and 1 cc – Frazer R. Lockhart

Comprehensive Corrective Action Plan

Kaiser Hill LLC

Corrective Action	RM	Date Due	Status
Establish Executive Safety Review Board (ESRB) to: Review facility and institutional trends to determine collective significance and programmatic implications. Review safety significant events and issues with programmatic implications to ensure: identification and proper reporting, sufficiently robust cause analysis, corrective actions are adequate and appropriately targeted to root causes, corrective actions are completed, and corrective actions achieve the desired results. Provide feedback and direction concerning the focus and conduct of assessments.	Parker	12/12/2003	Complete
CEO clarify expectations with VPs on: accountability and performance; importance for procedural compliance; the need for robust, self critical analyses; the need for ensuring that cause analysis teams are sufficiently staffed; and the need for effective corrective actions; value of -on-the-floor presence of all levels of management and safety professionals, and mentoring as an effective tool; need for open internal and external reporting; value and importance of both self & independent assessment	Parker	1/30/2004	Complete
Meet with all Site Safety Management Program (SMP) owners to reaffirm expectations and accountability for their role as SMP owners in assessing SMP health, communicating issues, and establishing SMP Assessment criteria.	Lyle	2/4/2004	Complete
Disseminate the facts and results of the B371 GB-8 fire (and other recent significant events) and discuss with all workers: managements expectations, including worker response to fires and use of extinguishers, notification and evacuation, and evacuation protocols; what went wrong and why; and what management is doing to ensure that the serious problems are corrected.	Projects	2/20/2004	Complete
CEO meet with job supervisors to verify that messages being sent to the workforce are being accurately received and to reaffirm his support and expectations.	Parker	4/15/2004	Started
Conduct quarterly All Hands Safety Meetings, CEO schedule early each quarter. SE&QP provides supporting information: Recent safety issues, Lessons Learned and Good Practices, Upcoming events and milestones, Solicit workforce feedback, Communicate outcome, reinforce expectations.	Parker/Lyle	4/20/2004	Not Started

Comprehensive Corrective Action Plan

Kaiser Hill LLC

Corrective Action	RM	Date due	Status
Enhance the Safety Analysis Center (SAC) process to: Improve identification of programmatic & collective significance of events, potential trends, and precursor conditions; establish an active interface with the ESRB and criteria for referring events and analyses to the ESRB; adopt ORPS Cause codes; establish and report on procedural compliance metrics; clarify process for dispositioning of DOE Facility Representative comments; collect and disseminate Independent and Self Assessment data to SMP owners; Provide input to communications on trends, emerging or cyclic issues for use in employee communication tools.	Williams	5/15/2004	Started
Work Control			
Corrective Action	RM	Date Due	Status
Conduct a work control workshop with a representative group of planners, supervisors and workers to provide inputs for needed changes to the IWCP and procedures programs.	Williams	3/12/2004	Complete
CEO direct Project Managers to develop documented process for enhanced utilization of technical resources to respond to and assist work crews in the field.	Williams	3/24/2004	Complete
As a compensatory measure while corrective actions are in progress, issue a Standing Order to initiate a senior level Project process for the review and release of work packages to ensure: the correct type of work package is being used, work package scope is appropriately defined and hazards identified, and the level of detail for controls and instructions is appropriate	Projects	3/31/2004	Complete
Complete a Site Integrated Safety Management System (ISMS) evaluation with emphasis on Work Control, by an independent team of outside experts. Review and develop a corrective action plan to address findings.		3/31/2004	Complete
Develop integrated walk down guidance for enhancing effectiveness of walk downs.	Williams	4/1/2004	Complete
CEO direct Project Managers to prioritize and allocate time for walk downs, ensure crew walk down and participation, and ensure turnover crew walk down	Parker	4/1/2004	Complete

Comprehensive Corrective Action Plan

Kaiser Hill LLC

Work Control				
Corrective Action	RM	Date Due	Status	
Based upon results of RWP and IWCP reviews make necessary changes to the IWCP manual, procedure process, and radiological hazard analysis processes (ALARA and RWP) and develop an implementation plan	Sexton	4/30/2004	Started	
With project support conduct a review of radiological work permit implementation to determine the quality and consistency of site RWPs and compliance with the site Radiological Control Manual and Integrated Work Control Manual.	Sexton	4/30/2004	Started	
Evaluate Automated Hazards Analysis system used at other sites for developing JHAs and determine appropriateness for use at RFETS.	Williams	4/30/2004	Not Started	
Provide guidance in IWCP for walk downs, developing scope, single revision process, clarify WP selection criteria, and use of mockups and develop real time feedback process.	Sexton	4/30/2004	Started	
Develop examples of IWCP packages that demonstrate the enhanced work control process.	Williams-	5/15/2004	Not Started	
Based on the results of the RWP implementation review for quality and consistency, and input from the Radiological Safety Center of Excellence, revise site RWPs and/or procedural guidance as appropriate.	Sexton	5/15/2004	Not Started	
Communicate changes to management, supervision, and workers; provide additional training as necessary to planners, RMs, Rad Ops Supervisors, and Rad Engineers.	Projects	5/30/2004	Not Started	
Verify effectiveness of enhanced technical response resources to respond to and assist work crews in the field.	Lyle	6/15/2004	Not Started	
Perform a documented review and, as necessary, revise active work packages, procedures, radiation work permits, (RWP), and/or ALARA reviews	Projects	6/15/2004	Not Started	

Comprehensive Corrective Action Plan

Kaiser Hill LLC

Corrective Action	RM	Date Due	status
Review Standing Orders and revise, extend, supercede, delete, or incorporate as appropriate.	Lyle	12/26/2003	Complete
Provide clear guidance and expectations for conducting effective Pre-Evolution Briefings and conducting effective Plan of the Day meetings. - Revise the site Conduct of Operations Manual, MAN-066-COOP to enhance the Pre-Evolution Brief process to ensure that the work crew and supervisor fully understand the daily work scope, hazards, controls, and procedure compliance requirements, and are ready to go to work. Enhance the Plan of the Day (POD) process to require discussion of concurrent/sequential work activities that may interact, interfere or impact other activities at the POD	Williams	1/15/2004	Complete
Provide clear guidance and expectations for conducting effective Pre-Evolution Briefings and conducting effective Plan of the Day meetings. - Clearly communicate changes and appropriately train the workforce to effectively implement COOP changes.	Projects	2/2/2004	Complete
VPs clarify expectations with the workforce on importance of procedural compliance.	Projects	2/20/2004	Complete
Revise SMP Procedure (PRO-1331-SMP) to clarify responsibility of SMP Owners for evaluation of their program's health.	Lyle/Projects	4/30/2004	Started

Cause A1

Corrective Action	RM	Date Due	Status
Senior managers discuss the initiating deficiencies, causes, and corrective actions of recent events, and expectations with the workforce	Projects	2/20/2004	Complete
Evaluate and revise the K-H PAAA reporting program to improve performance in meeting EH-6 guidance.	Sexton	4/15/2004	Started
Evaluate Site process for cause analysis and make changes as necessary to provide clear guidance and expectations for effectively performing cause analyses.	Sexton	4/30/2004	Started

Comprehensive Corrective Action Plan

Kaiser Hill LLC

Corrective Action	RM	Date Due	status
Develop a CY04 Integrated Assessment schedule that increases number and scope of assessments based on risk priorities to include the following: Independent Assessment - ISM/work control program/process implementation; implementation of training in the Projects; self assessment process effectiveness; and cause analysis and corrective action process including implementation. Self-Assessments - work control program execution, combustible control implementation, and COOP.	Ford	1/31/2004	Complete
Conduct an independent review of GB-8 fire, investigation, cause analysis, corrective actions.	Spears	2/6/2004	Complete
CH2M Hill establish nuclear safety corporate governance function which will perform evaluations of selected safety areas.	Christopher	2/26/2004	Complete
Perform self assessments in the following areas: work control program, combustible control program implementation, use of accountability boards, formality of operations in CCA offices, use of HIS 20 system, housekeeping in out of the way areas	Projects	3/31/2004	Started
Evaluate assessment programs at other sites for applicability for enhancing the RFETS program.	Ford	4/15/2004	Started
Evaluate site assessment program and change as necessary based on the review of other assessment programs.	Ford	4/30/2004	Started
Revise self-assessment procedures to include specific requirements for appropriate treatment of precursor conditions and ensure that assessment products (plans, reports and conclusions) are submitted to SAC.	Ford	4/30/2004	Started
Assess the effectiveness of the ESRB.	Parker	6/15/2004	Not Started
Perform independent assessment of work planning and execution changes.	Ford	8/30/2004	Not Started

Comprehensive Corrective Action Plan

Kaiser Hill LLC

Corrective Action	RM	Date, Due	status
Issue Standing Order (SO) on employee/worker fire response requirements.	Lyle	3/15/2004	Complete
Update PremAire training to include emergency response expectations and required actions.	Walgren	3/31/2004	Started
Evaluate and revise as necessary, Site and building emergency response procedures to make sure they adequately address: events and conditions likely to occur; CCA responsibilities; assumption of Shift Superintendent functions; facility reentry criteria and required actions; drills and exercise criteria, including required scenarios; and emergency ventilation operations	Gibbs	4/30/2004	Started
Incorporate SO requirements into the Fire Protection Program Manual (FPPM) as source document for employee/worker fire fighting criteria and revise other Site documents and training material to align with the FPPM.	Campbell	4/30/2004	Started
Communicate changes to managers, supervisors, and workers; and train fire watch standers and PremAire workers	Projects	4/30/2004	Started
Evaluate current method for updating Fire Pre-Plan and determine if alternate procedure would be more effective given the rapidly changing facility conditions. Implement alternate approaches, as applicable.	Snyder	4/30/2004	Started

Safety Basis

Corrective Action	RM	Date Due	Status
Establish and implement a B371/374 DBIO with simplified controls.	Trice	9/25/2003	Complete
Perform a self-assessment of Surveillance Requirement documentation since DBIO implementation to ensure implementation has been maintained.	Projects	4/15/2004	Not Started
Assess DBIO (or currently active DSA) IVR evidence to assure compliance with the IVR process (559, 707, 776 only)	Geis	4/30/2004	Not Started

Comprehensive Corrective Action Plan

Kaiser Hill LLC

Safety Basis				
	Corrective Action	RM	Date Due	status

Review and revise the Site ISMS Manual as necessary to address changes made to Safety Management Program documents	Williams	5/30/2004	Not Started
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Training				
	Corrective Action	RM	Date Due	Status

Establish qualification process for personnel performing self-assessments and surveillances.	Ford	4/15/2004	Not Started
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Evaluate training program processes and implementation for appropriate use of LOQI and promulgation of procedure changes. Establish corrective actions to address deficiencies identified.	Lyle	4/30/2004	Not Started
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Train and qualify self-assessment personnel to assessment program requirements.	Projects	5/15/2004	Not Started
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Establish training requirements for personnel performing cause analysis and collective significance	Sexton	5/15/2004	Not Started
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Conduct training involving senior, experienced job supervisors sharing lessons on work force management techniques and proper response to worker concerns.	Williams/Projects	5/15/2004	Not Started
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Revise the requirements for conducting drills to evaluate the effectiveness of employee response to fires.	Projects	5/15/2004	Started
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Train cause analysts, SMP owners, and Project SMP representatives on cause analysis requirements.	Projects	6/15/2004	Not Started
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